

EXHIBIT N

From: julianne.osborne@lw.com <julianne.osborne@lw.com>
Sent: Monday, November 7, 2022 1:01 PM
To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; Arman.Zahoory@lw.com; Ryan.Banks@lw.com; Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; pmuto@hodgsonruss.com; RFluskey@hodgsonruss.com
Cc: SKYRYSEMOOG.LWTEAM@lw.com; green.a@wssllp.com; truitt.a@wssllp.com; mireles.a@wssllp.com
Subject: RE: Skyryse/Moog: Meet and Confer

Kazim,

We write to confirm that Lawrence Chow, Mario Brenes, Santiago Correa-Mejia, Cynthia Le, and John Stafford will be responding to Moog's subpoenas notwithstanding the Court's sequencing of discovery.

Best,
Juli

Julianne Osborne

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From: Kazim Naqvi <KNaqvi@sheppardmullin.com>
Sent: Saturday, November 5, 2022 2:21 PM
To: Zahoory, Arman (Bay Area) <Arman.Zahoory@lw.com>; Banks, Ryan (Bay Area) <Ryan.Banks@lw.com>; Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; pmuto@hodgsonruss.com; RFluskey@hodgsonruss.com
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Subject: RE: Skyryse/Moog: Meet and Confer

Arman:

On the third-party discovery, thank you for confirming that Alan Lee, Tri Dao, and Dan Gunderson will be producing documents. We expect a response regarding the other third parties referenced in your e-mail (Lawrence Chow, Mario Brenes, Santiago Correa-Mejia, Cynthia Le, and John) by COB Eastern Time on Monday, November 7th.

Thank you,
Kazim

Kazim Naqvi
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From: Arman.Zahoory@lw.com <Arman.Zahoory@lw.com>

Sent: Friday, November 4, 2022 5:36 PM

To: Kazim Naqvi <KNaqvi@sheppardmullin.com>; Ryan.Banks@lw.com; Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; Lai Yip <LYip@sheppardmullin.com>; pmuto@hodgsonruss.com; RFluskey@hodgsonruss.com

Cc: SKYRYSEMOOG.LWTEAM@lw.com; green.a@wssllp.com; truitt.a@wssllp.com; mireles.a@wssllp.com

Subject: RE: Skyrise/Moog: Meet and Confer

Kazim,

We write to follow up on the parties' discussions regarding the discovery Moog believes is necessary to identify its trade secrets in order to ensure that the parties fully understand the issues that will be raised in the parties' November 7th filings or at the November 10, 2022 hearing.

Electronic Devices – we have received your November 2, 2022 letter and disagree with the statements in it. Suffice to say that the parties appear to be at an impasse regarding Moog's demand that Skyrise produce three laptops and the file listings and connection histories for five additional laptops and the 55D28D65 USB device.

Volume Shadow Copies – Skyrise disagrees that Moog has met its burden to demonstrate that the requested volume shadow copy contains relevant evidence, much less that this information is necessary for Moog to identify its trade secrets. We are also at a loss as to why Moog refuses to identify the approximately 780 files Moog claims were deleted off the device, which Moog believes may contain Moog confidential information. That said, in an attempt to reduce the burden on the court, and without conceding that Moog is entitled to this information, Skyrise agrees to make the VSC you have requested available for review. We will follow up on the timing of when we expect to complete our privilege review of that VSC. This should resolve the parties' disputes over the VSCs.

Third-Party Discovery – we confirm that notwithstanding the Court's sequencing of discovery or the fact that Moog has not identified this discovery as necessary to enable it to identify its trade secrets, Alan Lee, Tri Dao, and Dan Gunderson will be producing documents consistent with their objections in response to the subpoenas served on them. And as we discussed on yesterday's call, we are working to confirm with Lawrence Chow, Mario Brenes, Santiago Correa-Mejia, Cynthia Le, and John Stafford whether they are amenable to responding to Moog's subpoenas notwithstanding the Court's sequencing of discovery. We expect to have a confirmation for you on that by Monday with the hope that the parties can avoid further motion practice on the timing of third-party discovery.

Source Code – we understand that Moog is not willing to compromise on its demand that the parties produce source code directly to iDS. The parties appear to be at an impasse on this issue, which we understand will need to be resolved by Judge McCarthy.

Subsequent Productions – We have now responded to your Wednesday email regarding Skyrise's productions and expect that our response has resolved Moog's concerns. To the extent Moog still plans to raise this issue with Judge McCarthy, please let us know immediately what Moog specifically plans to raise with the Court and what relief it intends to seek.

We are not aware of any other issues that either party intends to raise in their November 7 filings or at the November 10 hearing. If that is not correct please let us know immediately.

Best,
Arman

Arman Zahoory

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